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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TIMOTHY CASEY,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00546-JAD-GWF

**JOINT STIPULATION FOR EXTENSION OF  
TIME AND ~~PROPOSED ORDER~~**

**(SECOND REQUEST)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from October 29, 2018 to **November 30, 2018**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel was out of the office for the last two weeks on intermittent sick leave for the flu/acute pneumonia. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until mid-November. In addition, Counsel has active civil rights and representative misconduct matters that require immediate investigation. Counsel also has a Ninth Circuit brief due in mid-November, which requires multiple levels of review. Due to Counsel's unexpected leave, Counsel became behind on her heavy workload. As such, Counsel needs additional

1 time to adequately review the transcript and properly respond to Plaintiff's Motion for Summary  
2 Judgment. Defendant makes this request in good faith with no intention to unduly delay the  
3 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified  
4 accordingly.  
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7 Respectfully submitted,

8 Dated: October 25, 2018

/s/ \*Young Cho  
(\*as authorized by email on October 24, 2018)  
YOUNG CHO  
Attorney for Plaintiff

11  
12 Dated: October 25, 2018

DAYLE ELIESON  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

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16 By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

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19 **ORDER**

20 APPROVED AND SO ORDERED:  
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22  
23 DATED: 10/26/2018

  
HON. GEORGE FOLEY, JR.  
UNITED STATES MAGISTRATE JUDGE